

REMARKS

Reconsideration of the application is respectfully requested. In the Office Action, all pending claims 1-9 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Aho, Alfred; Sethi, Ravi; and Ullman, Jeffery D., "Compilers, Principles, Techniques, and Tools" (Aho, hereafter).

During the personal interview conducted on May 21, 2003 between Examiner Ella Colbert of the United States Patent and Trademark Office and Eunhee Park, applicant's representative, an agreement was reached with respect to allowable features of claims 1-9 as presented to the Examiner, pending final approval of the Primary Examiner. This reply formally presents the amended claims 1, 3, and 5 accordingly.

It was also discussed during the personal interview that the cited sections and the rest of the Aho reference describe conventional compiler techniques, which teaches to perform lexical, syntax, and semantic analysis at least to ensure that a program code includes only those statements recognized by or within the context of the compiler. Accordingly, the compiler techniques of Aho teach to process *known* commands and produce errors if *unknown* commands are encountered. It was also discussed that macro preprocessor of the Aho reference (see page 16, section 1.4; and page 5, section 1.2) substitutes or expands body of the user defined macros into the program in place of the macro itself, before the program is compiled. Thus, the substituted body includes *known* compiler grammar or commands.

Further, the C language keywords referred to in the Office Action, are *known* to the C compiler. These references do not disclose or suggest processing and executing *unknown* commands without recompiling the macro language. The compilers built according to the Aho reference and C language would not be able

to handle *unknown* commands unless the compilers were reprogrammed and recompiled to recognize these commands. The Office action even admits that "by definition a macro expands or is extended and is compiled initially at runtime," (see page 3 of the Office Action) presumably meaning that a macro is *expanded* into a body of instructions known to a compiler and recompiled each time it is run.

It was also presented to the Examiner that a *prima facie* case of obviousness has not been made at least because there is no motivation suggested and because the intended function of the Aho reference would be destroyed if the reference was combined or modified as suggested in the Office Action.

The Aho reference is concerned with conventional compiler techniques, in the Aho reference all symbols are presumed to be declared in the program, i.e., *known*, to the program. The compiler technique described in the Aho reference will produce error during, for example, the semantic analysis stage, if an unknown command is encountered. The Aho reference teaches to perform the syntax and semantic analysis to make sure that all symbols are declared previously. Thus, there is no motivation, suggestion or teaching of the desirability of making the combination to use an unknown command.

It was also discussed that references are not properly combinable or modifiable because combining the references would destroy the Aho reference's purpose or intended function. The Aho reference describes conventional compiler techniques where syntax and semantic analysis is performed to make sure all variables and symbols are checked and predefined before they are used. A compiler built according to the Aho reference will produce an error if it encounters an *unknown* command. Using *unknown* commands thus defeats the purpose of the functions of the compiler that is built to check for the correctness of

semantics and syntax, e.g., to make sure all symbols are declared and known.

Also according to the Examiner's request, a new reference, U.S. Patent No. 6,453,356, presented during the personal interview has been studied and considered by applicant's representative. Specifically, that reference describes a system and method for exchanging data between or among applications that may have different formats or protocols for representing informational content. Accordingly, that reference does not disclose, suggest, or teach an extensible macro language.

This communication is believed to be fully responsive to the Office Action and every effort has been made to place the application in condition for allowance. If a telephone interview would be of assistance in advancing prosecution of the subject application, the Examiner is requested to telephone the undersigned attorney at the number provided below.

Respectfully submitted,



Eunhee Park
Registration No. 42,976
Baker & McKenzie
805 Third Avenue
New York, NY 10022
Telephone (212) 751-5700
Facsimile (212) 759-9133